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**UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK**

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In re : Chapter 11  
:  
Gawker Media LLC, *et al.*,<sup>1</sup> : Case No. 16-11700 (SMB)  
:  
Debtors. : (Jointly Administered)  
:  
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**AMENDED AGENDA FOR HEARING TO BE HELD  
DECEMBER 13, 2016 AT 10:00 A.M. (PREVAILING EASTERN TIME)**<sup>2</sup>

Date and Time: December 13, 2016 at 10:00 A.M. (Prevailing Eastern Time)

Location of Hearing: The Honorable Judge Stuart M. Bernstein  
United States Bankruptcy Court for the Southern District of New York  
Alexander Hamilton Custom House  
One Bowling Green, Courtroom No. 723  
New York, New York 10004

Copies of Motions: A copy of each pleading can be viewed on the Court's website at [www.nysb.uscourts.gov](http://www.nysb.uscourts.gov) and the website of the Debtors' notice and claims agent, Prime Clerk LLC, at <https://cases.primeclerk.com/gawker>. Further information may be obtained by calling Prime Clerk toll free at 855-639-3375 or internationally at 1-917-651-0323.

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<sup>1</sup>The last four digits of the taxpayer identification number of the debtors are: Gawker Media LLC (0492); Gawker Media Group, Inc. (3231); and Gawker Hungary Kft. (f/k/a Kinja Kft.) (5056). Each Debtor's mailing addresses is c/o Opportune LLP, Attn: William D. Holden, Chief Restructuring Officer, 10 East 53rd Street, 33rd Floor, New York, NY 10022.

<sup>2</sup> New material added since the filing of the original agenda [Docket No. 571] is listed in italics in this amended agenda.

**CASE CONFERENCE**

**UNCONTESTED MATTERS**

1. Notice of Debtors' Application For Entry of an Order Authorizing the Retention and Employment of Bush Ross, P.A. as Special Florida Litigation Conflicts Counsel for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* To October 29, 2016 [Docket No. 464]

**Response Deadline:** December 1, 2016

**Responses Received:**

- a. Certificate of No Objection to Debtors' Application For Entry of an Order Authorizing the Retention and Employment of Bush Ross, P.A. as Special Florida Litigation Conflicts Counsel for the Debtors and Debtors in Possession Effective *Nunc Pro Tunc* To October 29, 2016 [Docket No. 561]

**Status:** *The Court entered an order approving the Application on December 12, 2016 [Docket No. 578]. This matter is not going forward.*

2. Motion of Proposed *Amici Curiae* Society of Professional Journalists, Reporters Committee for Freedom of the Press, and 19 Other Media Organizations for Leave to File Memorandum of Law as *Amici Curiae* [Docket No. 547]

**Response Deadline:** December 12, 2016

**Responses Received:** None.

**Related Documents:**

- a. Notice of Hearing on Motion of Proposed *Amici Curiae* Society of Professional Journalists, Reporters Committee for Freedom of the Press, and 19 Other Media Organizations for Leave to File Memorandum of Law as *Amici Curiae* [Docket No. 548]
- b. Application of Society of Professional Journalists, Reporters Committee for Freedom of the Press, and 19 Other Media Organizations to Shorten Notice Period with Respect to Their Motion for Leave to File Memorandum of Law as *Amici Curiae* [Docket No. 549]
- c. Order Granting Application of Society of Professional Journalists, Reporters Committee for Freedom of the Press, and 19 Other Media Organizations to Shorten Notice Period with Respect to Their Motion for Leave to File Memorandum of Law as *Amici Curiae* [Docket No. 557]

**Status:** This matter is going forward.

## **ADJOURNED MATTER**

3. Summary of First Interim Application of Simpson Thacher & Bartlett LLP, Counsel to the Official Committee of Unsecured Creditors, for Approval and Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred [Docket No. 470]

**Response Deadline:** November 28, 2016.

**Responses Received:** None.

### **Related Documents:**

- a. Notice of Adjournment of Hearing on First Interim Fee Applications of Professionals for Allowance and Payment of Compensation for Professional Services Rendered and for Reimbursement of Actual and Necessary Expenses [Docket No. 481]
- b. Notice of Filing of Exhibits G-1 and H To the First Interim Application of Simpson Thacher & Bartlett LLP, Counsel to the Official Committee of Unsecured Creditors, for Approval and Allowance of Compensation for Services Rendered and Reimbursement of Expenses Incurred [Docket No. 565]

**Status:** This matter has been adjourned to the December 15, 2016 hearing date.

## **CONTESTED MATTERS**

4. Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. [Docket No. 427, Exhibit A to Exhibit A] (the “Plan”)

**Response Deadline:** December 5, 2016

**Responses Received:**

- a. General Objection of Claimants Charles C. Johnson and Got News LLC to Debtors’ Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. [Docket No. 540]

**Status:** The Debtors believe that this objection has been consensually resolved among the parties.

- b. Limited Objection of Albert James Daulerio to Confirmation of the Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary kft. (doc. #413-1) with reservation of rights [Docket No. 543]

**Status: The Debtors believe that this objection has been consensually resolved among the parties.**

- c. Limited Objection of Publicis Media Agencies' to Confirmation of the Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. [Docket No. 544]

**Status: The Debtors believe that this objection has been consensually resolved among the parties.**

- d. Objection of Mitchell Williams to Confirmation of Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. [Dkt. 427] [Docket No. 545]

**Status: The Debtors believe that this objection has been consensually resolved among the parties.**

- e. Certain Writers' Response in Support of Confirmation of the Amended Chapter 11 Plan, or in the Alternative, Limited Objection and Reservation of Rights [Docket No. 546]

**Status: This response is going forward.**

- f. Memorandum of Law of *Amici Curiae* Society of Professional Journalists, Reporters Committee for Freedom of the Press, and 19 other Media Organizations in Support of Confirmation of the Amended Chapter 11 Plan [Docket No. 547-1]

**Status: This response is going forward.**

- g. Joint Statement of Dr. Siva Ayyadurai and Ashley Terrill Regarding Confirmation of the Debtors' Joint Amended Plan of Liquidation [Docket No. 550]

**Status: This response is going forward.**

- h. Declaration of D. Ross Martin Submitting Certain Documentation Received from XP Vehicles [Docket No. 570]

**Status: The objection contained in the exhibits to the declaration is going forward.**

- i. *Response of Terry G. Bollea to Objection of Mitchell Williams to Confirmation of Amended Joint Chapter 11 Plan of Liquidation for*

*Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. [Dkt. 427] [Docket No. 572]*

**Status: This response is going forward.**

*j Meanith Huon's Objections to Confirmation of Amended Joint Chapter 11 Plan of Liquidation of Debtors, Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. [Dkt. 427] [Docket No. 575]*

**Status: The Debtors believe that this objection has been consensually resolved among the parties.**

**Related Documents:**

- a. Order Approving (I) the Adequacy of the Disclosure Statement, (II) Solicitation and Notice Procedures with Respect to Confirmation of the Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft., (III) the Form of Ballots and Notices in Connection Therewith, and (IV) the Scheduling of Certain Dates with Respect Thereto [Docket No. 413]
- b. Notice of Filing of Plan Supplement Pursuant to the Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. [Docket No. 516]
- c. Declaration of James Daloia of Prime Clerk LLC Regarding the Solicitation of Votes and Tabulation of Ballots Cast on the Debtors' Amended Joint Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. [Docket No. 563]
- d. *Debtors' (I) Memorandum of Law in Support of Confirmation of Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. and (II) Omnibus Reply to Objections Thereto [Docket No. 574]*
- e. *Notice of Filing of Revised Version of Debtors' Amended Joint Chapter 11 Plan of Liquidation for Gawker Media Group, Inc., Gawker Media LLC, and Gawker Hungary Kft. and (II) Omnibus Reply to Objections Thereto [Docket No. 576]*

**Status: This matter is going forward as to the objection contained in Docket Nos. 570 and as to the responses in Docket Nos. 546, 547-1, 550, and 572. The Debtors believe that the objections in Docket Nos. 540, 543, 544, 545, and 575 have been consensually resolved among the parties.**

5. Notice of Presentment of Debtors' Application Pursuant to Sections 327(e), 328(a), and 330 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 for Entry of an Order Authorizing the Retention and Employment of Akin Gump Strauss Hauer & Feld LLP as Special Counsel to the Special Committee of the Board of Gawker Media Group, Inc. Effective Nunc Pro Tunc to August 3, 2016 [Docket No. 239]

**Response Deadline:** September 12, 2016

**Responses Received:**

- a. Objection of the Official Committee of Unsecured Creditors to Debtors' Application for Entry of an Order Authorizing the Retention and Employment of Akin Gump Strauss Hauer & Feld LLP as Special Counsel to the Special Committee of the Board of Gawker Media Group, Inc. Effective Nunc Pro Tunc to August 3, 2016 [Docket No. 260]

**Related Documents:**

- a. Notice of Adjournment of Presentment of Debtors' Application Pursuant to Sections 327(e), 328(a), and 330 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 for Entry of an Order Authorizing the Retention and Employment of Akin Gump Strauss Hauer & Feld LLP as Special Counsel to the Special Committee of the Board of Gawker Media Group, Inc. Effective Nunc Pro Tunc to August 3, 2016 [Docket No. 318]
- b. Notice of Further Adjournment of Presentment of Debtors' Application Pursuant to Sections 327(e), 328(a), and 330 of the Bankruptcy Code, Bankruptcy Rules 2014 and 2016, and Local Rules 2014-1 and 2016-1 for Entry of an Order Authorizing the Retention and Employment of Akin Gump Strauss Hauer & Feld LLP as Special Counsel to the Special Committee of the Board of Gawker Media Group, Inc. Effective Nunc Pro Tunc to August 3, 2016 [Docket No. 437]

**Status:** This matter is going forward.

6. Notice of Debtors' First Omnibus Objection to Claims (Director, Officer and Employee Indemnification Claims) [Docket No. 394]

**Response Deadline:** November 14, 2016

**Responses Received:**

- a. Objection of Certain Former and Current Writers, Employees and Independent Contactors to Debtors' First Omnibus Objection to Claims (No Liability Gawker Hungary Kft (f/k/a Kinja Kft) Indemnification Claims) [Docket No. 442]

**Related Documents:**

- a. Notice of Adjournment of Hearing on Debtors' First Omnibus Objection To Claims (Director, Officer and Employee Indemnification Claims) [Docket No. 507]

**Status:** This matter is going forward.

- 7. Notice of Debtors' Motion Pursuant to Bankruptcy Code Sections 105, 502(c) and 1129 and Bankruptcy Rules 3018 and 3021 for Approval of Claims Estimation and Plan Reserve Procedures [Docket No. 444]

**Response Deadline:** November 28, 2016

**Responses Received:**

- a. Mitchell Williams' Objection to Debtors' Motion Pursuant to Bankruptcy Code Sections 105, 502(c) and 1129 and Bankruptcy Rules 3018 and 3021 for Approval of Claims Estimation and Plan Reserve Procedures [Docket No. 485]
- b. Opposition of Claimants Charles C. Johnson and Got News LLC to Debtors Motion Pursuant to Bankruptcy Code Sections 105, 502(c), and 1129 and Bankruptcy Rules 3018 and 3021 for Approval of Claims Estimation and Plan Reserve Procedures [Docket No. 486]
- c. Publicis Media Agencies' Objection to Debtors' Motion Pursuant to Bankruptcy Code Sections 105, 502(c), and 1129 and Bankruptcy Rules 3018 and 3021 for Approval of Claims Estimation and Plan Reserve Procedures [Docket No. 489]
- d. Reserve Objection in Further in Support of Objection of Mitchell Williams to Debtors' Motion Authorizing and Establishing Certain Procedures for Approving Certain Claims Reserves and Distributions [Dkt. 444] [Docket No. 552]
- e. *Huon's Objections to Debtors' Motion for Approval of Claims Estimation and Plan Reserve Procedures [Docket No. 444] [Docket No. 575]*

**Related Documents:**

- a. Notice of Adjournment of Hearing on Debtors' Motion Pursuant to Bankruptcy Code Sections 105, 502(c) and 1129 and Bankruptcy Rules 3018 and 3021 for Approval of Claims Estimation and Plan Reserve Procedures [Docket No. 522]

**Status:** This matter is going forward.

8. Notice of Debtors' Motion Pursuant to Bankruptcy Code Sections 105 and 502(e)(1) and Bankruptcy Rule 3018 for Estimation of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 495]

**Response Deadline:** December 8, 2016

**Responses Received:** None.

**Related Documents:**

- a. Notice of Debtors' Omnibus Objection to Proofs of Claim Nos. 293, 294 and 295 filed by Albert James Daulerio [Docket No. 493]

**Status:** *The Debtors will be reserving \$500,000 under the Plan for Mr. Daulerio's claims.*

Dated: December 12, 2016

New York, New York

/s/ Gregg M. Galardi

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